

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION

B.P., H.A., and S.H., individually, and on  
Behalf of all others similarly situated,

Plaintiffs,

VERSUS

No. 2:23-cv-00071-TRM-CRW

CITY OF JOHNSON CITY, TENNESSEE,

KARL TURNER, individually and in his  
official capacity as Chief of the  
Johnson City Police Department,

KEVIN PETERS, individually and in his  
official capacity as Captain in the  
Johnson City Police Department,

TOMA SPARKS, individually and in his  
official capacity as Detective in the  
Johnson City Police Department,

JUSTIN JENKINS, individually and in his  
Official capacity as Detective in the  
Johnson City Police Department,

JEFF LEGAULT, individually and in his  
Official capacity as Detective in the  
Johnson City Police Department,

BRADY HIGGINS, individually and in his  
Official capacity as Detective in the  
Johnson City Police Department, and

DOES 8-20, inclusive,

Defendants.

**NOTICE OF SERVICE**

Please take notice that the Defendant, Kevin Peters, in his individual capacity, by and through counsel, forwarded Defendant Kevin Peter's Response to Plaintiffs' Second Set of Interrogatories and Requests for Production of Documents to all parties and/or to counsel of record for the parties in regard to this case via Email Transmission on Monday, April 15, 2024.

Respectfully submitted,

MOORE, RADER AND YORK, P. C.

s/DANIEL H. RADER IV, BPR #025998

DANIEL H. RADER IV / BPR #025998

P. O. Box 3347

Cookeville, TN 38502

Phone: (931) 526-3311

Fax: (931) 526-3092

[danny@moorerader.com](mailto:danny@moorerader.com)

Attorneys for Kevin Peters in his  
individual capacity

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically with the Court. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

Ashley Walter  
HMC Civil Rights Law, PLLC  
7000 Executive Center Dr.  
Brentwood, TN 37027  
615-724-1996  
Email: [ashley@hmccivilrights.com](mailto:ashley@hmccivilrights.com)

Caroline Drinnon  
HMC Civil Rights Law, PLLC  
7000 Executive Center Dr.  
Brentwood, TN 37027  
615-724-1996  
Email: [caroline@hmccivilrights.com](mailto:caroline@hmccivilrights.com)

Heather Moore Collins  
HMC Civil Rights Law, PLLC  
7000 Executive Center Dr.  
Suite 320  
Brentwood, TN 37027  
615-724-1996  
Email: [heather@hmccivilrights.com](mailto:heather@hmccivilrights.com)

Vanessa Baehr-Jones  
Advocates for Survivors of Abuse  
4200 Park Blvd., No. 413  
Oakland, CA 94602  
Email: [vanessa@advocatesforsurvivors.com](mailto:vanessa@advocatesforsurvivors.com)  
*Pro Hac Vice Attorney for Plaintiff*

Ms. Elizabeth A. Kramer  
Mr. Kevin M. Osborne  
Erickson, Kramer Osborne LLP  
44 Tehama Street  
San Francisco CA 94105  
(415-635-0631)  
Email: [elizabeth@eko.law](mailto:elizabeth@eko.law)  
Email: [kevin@eko.law](mailto:kevin@eko.law)

Mr. Keith H. Grant  
Mr. Philip Aaron Wells  
Ms. Laura Beth Rufolo  
Robinson, Smith & Wells  
633 Chestnut Street  
Suite 700 Republic Centre  
Chattanooga, TN 37450  
Email: [kgrant@rswlaw.com](mailto:kgrant@rswlaw.com)  
Email: [awells@rswlaw.com](mailto:awells@rswlaw.com)  
Email: [lrufolo@rswlaw.com](mailto:lrufolo@rswlaw.com)

Emily C. Taylor  
Watson Roach Batson & Lauderback  
P. O. Box 131  
Knoxville, TN 37901-0131  
865-637-1700  
Email: [etaylor@watsonroach.com](mailto:etaylor@watsonroach.com)  
*Attorney for the City of Johnson City,  
Tennessee, and Karl Turner, in his  
Individual Capacity*

K. Erickson Herrin  
Herrin McPeak & Associates  
515 E. Unaka Avenue  
P. O. Box 629  
Johnson City, TN 37605-0629  
(423-929-7113)  
*Attorney for the City of Johnson City,  
Tennessee, Karl Turner, in his  
individual and official capacities,  
Toma Sparks, in his official*

Thomas J. Garland, Jr.  
Milligan & Coleman, PLLP  
230 W Depot St.  
Greeneville, TN 37743  
Email: [tgardland@milligancoleman.com](mailto:tgardland@milligancoleman.com)  
*Attorney for the City of Johnson City,  
Tennessee, and Karl Turner, in his  
Individual capacity*

Vanessa Baehr-Jones  
Advocates for Survivors of Abuse PC  
4200 Park Boulevard No. 413  
Oakland, CA 94602  
510-500-9634  
Email: [vanessa@advocatesforsurvivors.com](mailto:vanessa@advocatesforsurvivors.com)

This 15th day of April, 2024.

*capacity, and Kevin Peters, in his  
official capacity*

Ms. Kristin E. Berexa  
Mr. Benjamin C. Allen  
Farrar Bates Berexa  
12 Cadillac Drive, Suite 480  
Brentwood, TN 37027  
615-254-3060  
Email: [kberexa@fbb.law](mailto:kberexa@fbb.law)  
[ballen@fbb.law](mailto:ballen@fbb.law)  
*Attorneys for Toma Sparks*

MOORE, RADER AND YORK, P. C.

s/DANIEL H. RADER IV, BPR 025998  
DANIEL H. RADER IV / BPR #025998  
P. O. Box 3347  
Cookeville, TN 38502  
(931-526-3311)  
[danny@moorerader.com](mailto:danny@moorerader.com)